

**Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services**

STATEMENT OF BASIS

**Bayou Steel Corporation
Initial Title V Permit
Laplace, St. John the Baptist Parish, Louisiana
Agency Interest Number: 3401
Activity Number: PER19960001
Draft Permit 2580-00017-V0**

I. APPLICANT:

Company:

Bayou Steel Corporation
P.O. Box 5000, Laplace, LA 70069
Approximate UTM coordinates are 743.856 kilometers East and 3325.579 kilometers North, Zone 15

II. FACILITY AND CURRENT PERMIT STATUS:

Bayou Steel Corporation currently operates a mini-steel mill, which includes two Electric Arc Furnace (EAF) process units and Ladle Metallurgical Facility (LMF), two Continuous Casting Units, Hot Rolling Mill, and an automobile shredder. Over 600 people are employed with Bayou Steel Corporation and work 12-hour shifts.

The automobile shredder converts life-expired automobiles into ferrous metal scrap, which is the primary steel feed source for the steel mill. A hammer mill is used to shred automobile bodies and other light scrap metal into fist sized pieces of metal.

The EAF steel melting process consists of melting scrap steel, carbon sources, lime, flux, alloys, and other iron bearing material in a refractory lined vessel, using three high voltage electrodes, to produce a recovered carbon steel product. Liquid steel is transferred from the EAF to continuous casting, where it is poured into billet molds; or to the LMF for further refining. Refined molten steel produced in the LMF is ultimately transferred to continuous casting.

In the casting area, a continuous strand of steel is cooled and cut into various lengths. Billets, derived from this continuous casting process, are sold as product or further processed in the Rolling Mill. In the Rolling Mill, billets undergo uniform reheating, in a gas-fired furnace, and are shaped, using various rolling operations. Steel sections, angles, channels, and I-beams are cut or sheared to various lengths and transferred to the

**Bayou Steel Corporation
Initial Title V Permit
Laplace, St. John the Baptist Parish, Louisiana
Agency Interest Number: 3401
Activity Number: PER19960001
Draft Permit 2580-00017-V0**

shipping warehouse for storage and loading. Approximately 1.1 million tons of material is processed annually.

The permit, giving authorization to construct and operate the two EAFs, was first issued February 28, 1978. Actual operation of the EAFs began on August 21, 1981. The EAFs currently operate under Louisiana Air Permit No. 885 (M-2), issued May 5, 1995. The LMF facility was added to the EAF steel mill operation, but was granted a separate small source permit, Permit No. 2554, issued April 29, 1998; under which the facility currently operates.

Bayou Steel Corporation steel mill is located approximately one mile south of Laplace, Louisiana in St. John the Baptist Parish. The facility is bounded by Louisiana Highway 3217 to the north and the Mississippi River to the west. Co-located with Bayou Steel Corporation's steel mill is the Mississippi River Recycling Automobile Shredder. This automobile shredder is a support facility, under common control by the Bayou Steel Corporation, and located on property contiguous to the steel mill. The automobile shredder currently operates under a small source Permit No. 2225, issued October 8, 1993.

Bayou Steel Corporation submitted a timely application for an initial Part 70 Operating Permit and continues to operate pursuant to the "application shield" provided in the program. The facility's three existing state permits, 885 (M-2), 2554, and 2225, will remain effective until replaced by the Part 70 Operating Permit.

III. PROPOSED PERMIT / PROJECT INFORMATION:

Proposed Permit

An application and Emission Inventory Questionnaire was submitted by Bayou Steel Corporation on October 14, 1996 requesting a Part 70 Operating Permit. A revised application and EIQ, dated October 21, 2004, was received, as well as additional information dated May 4, 2005, January 19, 2006, and January 20, 2006.

Project Description

With this initial Part 70 Operating Permit, Bayou Steel Corporation is proposing to:

- (1) Consolidate Louisiana State Permit Nos. 885 (M-2), 2554, and 2225.
- (2) Update various point source emissions as a result of emission factor updates or the incorporation of up-to-date stack test data.
 - a. Emission Point Number (EP No.) 01-77, Primary Dust Collection System.
 - b. EP No. 02-77A through F, Secondary Dust Collection System

Bayou Steel Corporation
Initial Title V Permit
Laplace, St. John the Baptist Parish, Louisiana
Agency Interest Number: 3401
Activity Number: PER19960001
Draft Permit 2580-00017-V0

- (3) Add previously, unaccounted for air emission sources or pollutants.
- a. EP No. 03-93 Shredder Fugitive Emissions;
 - b. EP No. 01-96 Casting Area Fugitives;
 - c. EP No. 02-96 Rolling Mill Fugitives;
 - d. EP No. 03-96 Scrap Metal Handling Fugitives;
 - e. EP No. 04-96 Product Coating Emissions;
 - f. EP No. 05-96 Bulk Unloading Emissions;
 - g. EP No. 06-96 Roads; and
 - h. CO and NO_x at EP No. 01-77, Primary Dust Collection System.
- (4) Update point source emissions due to a physical modification or a change in method of operations.
- a. Delete EP No. 02-94, Slag Pile Fugitive Emissions, and EP No. 14-94, IMS Gasoline Tank No. 6. These point sources are now under control and ownership by International Mill Service, Inc. (IMS).
 - b. Increase the average firing rate of the rolling mill furnace, EP No. 04-77, from 77.2 MM BTU/hr to 117.24 MM BTU/hr.
 - c. Increase operating hours at Shredder Cyclone and Scrubber, EP No. 01-93, and Trash Separator Cyclone, EP No. 02-93, from 2000 hr/yr to 2080 hr/yr.
 - d. Delete TAP emissions from EP No. 06-96, Roads. The facility no longer uses slag, metal impurities derived from the metal melting process, as road cover.
 - e. Delete EP No. 01-93, Shredder Cyclone and Scrubber and EP No. 02-93, Trash Separator Cyclone. The two cyclones and scrubber have been replaced by one cyclone, which is a closed system.
- (5) Designate EP No. 03-94 through 08-94, area bay heaters, as insignificant activities and delete their emissions contribution from the facility-wide total emissions. *These releases are not included in the facility-wide pollutant total because they are small in size and have an insignificant impact on air quality.*

Additional information to the permit application, dated January 20, 2006, lists the permitted emission rate before and after the application update (in tons per year) for each emission point in the permit. These changes are summarized in the Permitted Air Emissions Section of this document.

Permitted Air Emissions

<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
PM ₁₀	53.65	82.76	+ 29.11
SO ₂	7.13	29.91	+ 22.78
NO _x	151.35	160.93	+ 9.58

**Bayou Steel Corporation
Initial Title V Permit
Laplace, St. John the Baptist Parish, Louisiana
Agency Interest Number: 3401
Activity Number: PER19960001
Draft Permit 2580-00017-V0**

<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
CO	83.44	972.27	+ 888.83
VOC*	14.17	34.28	+ 20.11
Non-VOC TAPs**	11.53	13.09	+ 1.56

The increases, in the above sited pollutant emissions, are not due to any physical modification in equipment or any change in method of operations. The increase in CO emissions is due to previously unaccounted for emissions at the electric arc furnaces (EAFs). The initial state permit, 885, stated that CO would be destructed, thus CO emissions at the EAFs would be zero. *(The emissions for the EAFs are primarily accounted for at 01-77, the dust collectors; which is a dedicated baghouse for EAFs.)* CO destruction at the EAFs was never incorporated into the actual operational process design; therefore these emissions are now being incorporated into this Part 70 Permit. A Prevention of Significant Deterioration Review (PSD) is requested upon issuance of this permit.

PM₁₀ increases are primarily due to the previously unaccounted for emission sources identified in (3) above. VOC changes represent previously unaccounted for emissions associated with coating of the final steel products (EP No. 04-96, Product Coating Emissions).

Increases in Non-VOC LAC 33:III Chapter 51 Toxic Air Pollutants are the result of previously unaccounted for point sources and previously unaccounted for emissions at existing point sources in the Automobile Shredder Operation.

Regulatory Analysis

This application was reviewed for compliance with the Louisiana Part 70 operating permit program, Louisiana Air Quality Regulations, Louisiana Comprehensive TAP Emission Control Program, NSPS, NESHAP, CAM and PSD regulations.

Louisiana Air Quality Regulations and NSPS

The applicability of the appropriate regulations is straightforward and provided in the Facility Specific Requirements Section of the draft permit, or Table 1 of the draft permit. Similarly, the Monitoring, Reporting and Recordkeeping necessary to demonstrate compliance with the applicable terms, conditions and standards are provided in the Facility Specific Requirements Section of the draft permit.

**Bayou Steel Corporation
Initial Title V Permit
Laplace, St. John the Baptist Parish, Louisiana
Agency Interest Number: 3401
Activity Number: PER19960001
Draft Permit 2580-00017-V0**

Prevention of Significant Deterioration Applicability

Bayou Steel Corporation is a major stationary source. PSD applies to any major stationary source or major modification to an existing major stationary source. PSD is applicable if new emission increases, from a physical modification or a change in the method of operations, exceed the PSD Significance Levels for regulated pollutants, listed in LAC 33:III.509.I.4.b. The emission increases in this permit are due to changes in emission factors, previously unaccounted for source emissions, and the consolidation of several permits into one.

With issuance of the Part 70 Operating permit, the facility has specific requirements to perform a PSD review for CO and NO_x emissions at the EAFs, according to Federal PSD regulations, 40CFR 52.2, and Louisiana State regulations, LAC 33:III.509.

MACT Requirements

The entire facility (EAF, LMF, and Automobile shredder) is a major source of toxic air pollutants (TAPs) pursuant to LAC 33:III.Chapter 51; due to Zinc emissions, which is a Class III TAP. Arsenic, Barium, Cadmium Chromium, Copper, Manganese, and Nickel are either Class I or Class II compounds that are above their respective minimum emission rate (MER), and therefore, sources of these emissions shall comply with all applicable provisions of the Louisiana Air Toxics Program, LAC 33:III.Chapter 51, regarding these compounds. In addition, the facility must meet the requirements for ambient air standards. (See Section VII. Ambient Air Standards).

No MACT exists for EAFs steel industry. Compliance with NSPS for EAFs is accepted by DEQ as compliance with MACT until such time a MACT standard is promulgated.

Bayou Steel Corporation submitted to DEQ, a certification of compliance with all MACT requirements, in accordance with LAC 33:III.5109.D. A compliance plan was approved for the EAF Steel Making Process April 13, 1995.

The LMF and Automobile Shredder operations were permitted previously as minor sources, but have controls that are MACT.

Newly promulgated NESHAPs standards exist for steel foundries. However, Bayou Steel is not a major source of hazardous air pollutants (HAPs) and does not meet the applicability for this federal regulation.

**Bayou Steel Corporation
Initial Title V Permit
Laplace, St. John the Baptist Parish, Louisiana
Agency Interest Number: 3401
Activity Number: PER19960001
Draft Permit 2580-00017-V0**

Air Modeling Analysis

Dispersion air modeling was performed according to the requirements of LAC 33:III. Chapter 51 for those toxic air pollutants, which are above their respective minimum emission rates (MERs), which included Arsenic, Barium, Cadmium Chromium IV, Copper, Manganese, Nickel and Zinc. In addition, air dispersion modeling was performed for PM₁₀ to demonstrate compliance with the National Ambient Air Quality Standards (NAAQS). Dispersion air modeling, using 2004 meteorological data and United States Environmental Protection Agency (US EPA) and DEQ protocols, indicates the highest predicted ambient concentrations for each of the TAPs are well below the Ambient Air Standards (AAS); and the NAAQS is not violated for PM₁₀. A summary of the report is included in the permit narrative, section VII. Effects on Ambient Air.

General Condition XVII Activities

The facility will comply with the applicable General Condition XVII Activities emissions as required by the operating permit rule. However, General Condition XVII Activities are not subject to testing, monitoring, reporting or recordkeeping requirements. For a list of approved General Condition XVII Activities, refer to Section VIII of the draft Part 70 permit.

Insignificant Activities

All Insignificant Activities are authorized under LAC 33:III.501.B.5. For a list of approved Insignificant Activities, refer to Section IX of the draft Part 70 permit.

IV. PERMIT SHIELDS

A permit shield was requested but is being denied as the request did not explicitly state the federally applicable requirements.

V. PERIODIC MONITORING

Federal regulation 40 CFR 64 Compliance Assurance Monitoring is applicable to this facility. Applicability for each pollutant, requires that the unit be subject to an emission limitation or standard and must use a control device to achieve compliance. Exceedance of the emission limits shall be reported to the Office of Environmental Compliance, Enforcement Division in accordance with 40 CFR Part 70 General Condition R. Bayou Steel must submit a CAM plan either at the first renewal of their Part 70 Operating Permit or during implementation of a major modification.

XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source			
ID No:	Description	Requirement	Notes
	Plant Wide	Vapor Degreasers [LAC 33:III.2125]	EXEMPT. Bayou Steel does not emit 100 lbs. or greater in any 24-hr period or 100 TPY from all its degreasers.
		Chemical Accident Prevention and Minimization of Consequences [LAC 33:III.5909] Major stationary sources that have a regulated substance in a process in more than the threshold quantity shall prepare a Chemical Accident Prevention and Minimization of Consequences Plan.	DOES NOT APPLY. Bayou Steel does not have a process that has a regulated substance present in more than the threshold quantity. None of LAC 33:III.Chapter 59 apply to Bayou Steel (see 40 CFR Part 68, above).
		Standards of Performance for Primary Emissions from Basic Oxygen Process Furnaces for Which Construction is Commenced After June 11, 1973 [40 CFR 60, Subpart N] The affected facility to which the provisions of this subpart apply is each basic oxygen process furnace.	DOES NOT APPLY. The facility does not operate a basic oxygen process furnace. <i>Basic oxygen process furnace (BOPF) means any furnace with a refractory lining in which molten steel is produced by charging scrap metal, molten iron, and flux materials or alloy additions into a vessel and introducing a high volume of oxygen-rich gas.</i>
		National Emission Standards for Hazardous Air Pollutants [40 CFR 61, Subpart A] This part applies to the owner or operator of any stationary source for which a standard is prescribed under this part.	DOES NOT APPLY. A standard is not prescribed under this subpart for this stationary source.

Bayou Steel Corporation
Initial Title V Permit
Laplace, St. John the Baptist Parish, Louisiana
Agency Interest Number: 3401
Activity Number: PER19960001
Draft Permit 2580-00017-V0

XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source			
ID No:	Description	Requirement	Notes
	Plant Wide	<p>National Emission Standards for Beryllium [40 CFR 61, Subpart C]</p> <p>The provisions of this subpart are applicable to extraction plants, ceramic plants, foundries, incinerators, and propellant plants which process beryllium ore, beryllium, beryllium oxide, beryllium alloys, or beryllium-containing waste.</p>	<p>DOES NOT APPLY. Bayou Steel does not process beryllium ore, beryllium, beryllium oxide, beryllium alloys, or beryllium-containing waste.</p> <p><i>Beryllium alloy means any metal to which beryllium has been added in order to increase its beryllium content and which contains more than 0.1 percent beryllium by weight.</i></p>
		National Emission Standards for Mercury [40 CFR 61, Subpart E]	DOES NOT APPLY. Bayou Steel does not process mercury ore to recover mercury, use mercury chlor-alkali cells to produce chlorine gas and alkali metal hydroxide, and incinerate or dry wastewater treatment plant sludge.
		National Emission Standards for Hazardous Air Pollutants [40 CFR 63, Subpart A]	DOES NOT APPLY. This facility is not subject to any standard, limitation, prohibition, or other federally enforceable requirement pursuant to this subpart.

Bayou Steel Corporation
Initial Title V Permit
Laplace, St. John the Baptist Parish, Louisiana
Agency Interest Number: 3401
Activity Number: PER19960001
Draft Permit 2580-00017-V0

XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source			
ID No:	Description	Requirement	Notes
	Plant Wide	<p>National Emission Standards for Hazardous Air Pollutants for Iron and Steel Foundries [40 CFR 63, Subpart EEEEE]</p> <p><i>Iron and steel foundry means a facility or portion of a facility that melts scrap, ingot, and/or other forms of iron and/or steel and pours the resulting molten metal into molds to produce final or near final shape products for introduction into commerce. Research and development facilities and operations that only produce non-commercial castings are not included in this definition.</i></p>	<p>DOES NOT APPLY. The facility is not a foundry nor is the facility a major source of hazardous air pollutant (HAP) emissions.</p> <p><i>A major source is a source emits or has the potential to emit any single HAP at a rate of 10 tons or more per year or any combination of HAP at a rate of 25 tons or more per year or if it is located at a facility that emits or has the potential to emit any single HAP at a rate of 10 tons or more per year or any combination of HAP at a rate of 25 tons or more per year.</i></p>
		<p>National Emission Standards for Hazardous Air Pollutants for Integrated Iron and Steel Manufacturing Facilities [40 CFR 63, Subpart FFFFF]</p> <p>Integrated iron and steel manufacturing facility means an establishment engaged in the production of steel from iron ore.</p> <p>Accidental Release Prevention. [40 CFR 68]</p>	<p>DOES NOT APPLY. The facility is not an integrated iron and steel manufacturing facility.</p>
		<p>National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products [40 CFR 63, Subpart MMMM]</p>	<p>DOES NOT APPLY. Bayou Steel does not have a process that has a regulated substance present in more than the threshold quantity.</p>
ARE 003	04-96 <i>Product Coating Emissions</i>		<p>DOES NOT APPLY. Coatings used at the facility do not contain hazardous air pollutants (HAP).</p>

Bayou Steel Corporation
Initial Title V Permit
Laplace, St. John the Baptist Parish, Louisiana
Agency Interest Number: 3401
Activity Number: PER19960001
Draft Permit 2580-00017-V0

XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source			
ID No:	Description	Requirement	Notes
EQT 005	01-98 <i>Ladle Metallurgical Facility</i>	Emission Standards for Sulfur Dioxide Emission Limitations [LAC 33:III.1503.C]	EXEMPT. Unit emits less than 250 tons of SO ₂ per year. Record and retain at the site for at least 2 years the data required to demonstrate compliance with or exemption from SO ₂ standards of Chapter 15. Compliance data shall be reported annually in accordance with LAC 33:III.918.
EQT 013	04-77 <i>Rolling Mill Furnace</i>	Recordkeeping and Reporting [LAC 33:III.1513]	
FUG 002	01-96 <i>Casting Area Fugitives</i>		
EQT 014	11-94 <i>Gasoline Tank No. 3</i>	NSPS Subpart K -- Standards of Performance for Storage Vessels for Which Construction, Reconstruction, or Modification Commences after June 11, 1973 and Prior to May 19, 1978.	DOES NOT APPLY. Storage tank was constructed after May 19, 1978.
		NSPS Subpart Ka -- Standards of Performance for Storage Vessels for Petroleum liquids for Which Construction, Reconstruction, or Modification Commences after May 18, 1978 and Prior to July 23, 1984. [40 CFR 60.110a]	DOES NOT APPLY. Storage tank is less than 40,000 gallons.
		NSPS Subpart Kb -- Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984. [40 CFR 60.110b]	DOES NOT APPLY. Storage tank was constructed prior to July 23, 1984.

Bayou Steel Corporation
Initial Title V Permit
Laplace, St. John the Baptist Parish, Louisiana
Agency Interest Number: 3401
Activity Number: PER19960001
Draft Permit 2580-00017-V0

XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source			
ID No:	Description	Requirement	Notes
EQT 015	01-77a <i>Electric Arc Furnace No. 1 & No. 2</i>	Standards of Performance for Steel Plants: Electric Arc Furnaces and Argon-oxygen Decarburization Vessels Constructed After August 17, 1983. [40 CFR 60, Subpart AAa]	DOES NOT APPLY. Electric Arc Furnaces were constructed prior to August 17, 1983.
EQT 003	01-77 <i>Primary Dust Collection System</i>		
FUG 001	01-94 <i>Furnace House Fugitives</i>		

VI. STREAMLINED REQUIREMENTS			
Unit or Plant Site	Programs Being Streamlined	Stream Applicability	Overall Most Stringent Program
Bayou Steel Corporation	None		

Glossary

Best Available Control Technologies (BACT) - An emissions limitation (including a visible emission standard) based on the maximum degree of reduction for each pollutant subject to regulation under this part which would be emitted from any proposed major stationary source or major modification which the administrative authority, on a case-by-case basis, taking into account energy, environmental, and economic impacts and other costs, determines is achievable for such source or modification through application of production processes or available methods, systems, and techniques, including fuel cleaning or treatment or innovative fuel combustion techniques for control of such pollutant.

CAM - Compliance Assurance Monitoring rule – A federal air regulation under 40 CFR Part 64

Carbon Monoxide (CO) – A colorless, odorless gas, which is an oxide of carbon.

Electric arc furnace means a vessel in which forms of iron and steel such as scrap and foundry returns are melted through resistance heating by an electric current flowing through the arcs formed between the electrodes and the surface of the metal and also flowing through the metal between the arc paths.

Electric induction furnace means a vessel in which forms of iron and steel such as scrap and foundry returns are melted through resistance heating by an electric current that is induced in the metal by passing an alternating current through a coil surrounding the metal charge or surrounding a pool of molten metal at the bottom of the vessel.

Grandfathered Status- Those facilities that were under actual construction or operation as of June 19, 1969, the signature date of the original Clean Air Act. These facilities are not required to obtain a permit. Facilities that are subject to Part 70 (Title V) requirements lose grandfathered status and must apply for a permit.

Hydrogen Sulfide (H₂S) - A colorless inflammable gas having the characteristic odor of rotten eggs, and found in many mineral springs. It is produced by the action of acids on metallic sulfides, and is an important chemical reagent.

Iron and steel foundry means a facility or portion of a facility that melts scrap, ingot, and/or other forms of iron and/or steel and pours the resulting molten metal into molds to produce final or near final shape products for introduction into commerce. Research and development facilities and operations that only produce non-commercial castings are not included in this definition.

Bayou Steel Corporation
Initial Title V Permit
Laplace, St. John the Baptist Parish, Louisiana
Agency Interest Number: 3401
Activity Number: PER19960001
Draft Permit 2580-00017-V0

Maximum Achievable Control Technology (MACT) - The maximum degree of reduction in emissions of each air pollutant subject to LAC 33:III.Chapter 51 (including a prohibition on such emissions, where achievable) that the administrative authority, upon review of submitted MACT compliance plans and other relevant information and taking into consideration the cost of achieving such emission reduction, as well as any non-air-quality health and environmental impacts and energy requirements, determines is achievable through application of measures, processes, methods, systems, or techniques.

Metal melting furnace means a cupola, electric arc furnace, or electric induction furnace that converts scrap, foundry returns, and/or other solid forms of iron and/or steel to a liquid state. This definition does not include a holding furnace, an argon oxygen decarburization vessel, or ladle that receives molten metal from a metal melting furnace, to which metal ingots or other material may be added to adjust the metal chemistry.

NESHAP - National Emission Standards for Hazardous Air Pollutants – Toxic air emission standards for specific types of facilities, as outlined in 40 CFR Parts 61 through 63

Nitrogen Oxides (NO_x) - Compounds whose molecules consists of nitrogen and oxygen.

Nonattainment New Source Review (NNSR) - A New Source Review permitting program for major sources in geographic areas that do not meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. Nonattainment NSR is designed to ensure that emissions associated with new or modified sources will be regulated with the goal of improving ambient air quality.

NSPS - New Source Performance Standards – Air emission standards for specific types of facilities, as outlined in 40 CFR Part 60

Organic Compound - Any compound of carbon and another element. Examples: Methane (CH₄), Ethane (C₂H₆), Carbon Disulfide (CS₂)

Part 70 Operating Permit- Also referred to as a Title V permit, required for major sources as defined in 40 CFR 70 and LAC 33:III.507. Major sources include, but are not limited to, sources which have the potential to emit: ≥ 10 tons per year of any toxic air pollutant; ≥ 25 tons of total toxic air pollutants; and ≥ 100 tons per year of regulated pollutants (unless regulated solely under 112(r) of the Clean Air Act) (25 tons per year for sources in non-attainment parishes).

PM₁₀- Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers as measured by the method in Title 40, Code of Federal Regulations, Part 50, Appendix J.

**Bayou Steel Corporation
Initial Title V Permit
Laplace, St. John the Baptist Parish, Louisiana
Agency Interest Number: 3401
Activity Number: PER19960001
Draft Permit 2580-00017-V0**

Potential to Emit (PTE) - The maximum capacity of a stationary source to emit any air pollutant under its physical and operational design.

Prevention of Significant Deterioration (PSD) - A New Source Review permitting program for major sources in geographic areas that meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. PSD requirements are designed to ensure that the air quality in attainment areas will not degrade.

Sulfur Dioxide (SO₂) - An oxide of sulphur.

TAP - Toxic Air Pollutant (LDEQ acronym for air pollutants regulated under LAC 33 Part III, Chapter 51, Tables 1 through 3

Title V permit - See Part 70 Operating Permit.

Volatile Organic Compound (VOC) - Any organic compound which participates in atmospheric photochemical reactions; that is, any organic compound other than those which the administrator of the U.S. Environmental Protection Agency designates as having negligible photochemical reactivity.